

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY and
NEIL BEDI,

Plaintiffs,

v.

UNITED STATES DEFENSE
COUNTERINTELLIGENCE AND SECURITY
AGENCY,

Defendant.

No. 25-cv-2333-DLC

NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment and in Opposition to Defendant's Motion for Summary Judgment, as well as the Declaration of Dana R. Green and the exhibits thereto, Plaintiffs The New York Times Company and Neil Bedi hereby move this Court for an order pursuant to Federal Rule of Civil Procedure 56 entering summary judgment in favor of Plaintiffs.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Court's scheduling order entered on April 29, 2025, opposition papers must be served upon Plaintiffs no later than July 18, 2025.

Dated: June 27, 2025
New York, New York

THE NEW YORK TIMES COMPANY

By: /s/ Dana R. Green
Dana R. Green
Alexandra Settelmayer
Timothy Tai
The New York Times Company
Legal Department
620 8th Avenue
New York, NY 10018
Phone: (212) 556-5290
Fax: (212) 556-4634
dana.green@nytimes.com
alexandra.settelmayer@nytimes.com
timothy.tai@nytimes.com

Attorneys for Plaintiffs